

# **EXHIBIT 275**

Ticket#		Account#		Initiated Date	03/13/2013 11:44 AM
Client Name	SOUTHERN FINANCIAL LLC	Account Title		Initiator	CHRISTINE HEWITT
EGL		Account Type		Initiating Team	PB FRONT OFFICE

#### Verify & Confirm for SOUTHERN FINANCIAL LLC

Final Risk Rating	Standard
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No
Reason for Adjustment	Not associated with high risk jurisdictions. Derogatory information has already been addressed.
Comments	
Summary of Risk Attributes	

#### Risk Updated History

Creation Date	Entered by	Updated Risk	Previous Risk	Comment

#### GCS Grid

Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed (TAX ID and ADDRESS); details included in the attachment.	Yes
Corporate Records	Information not confirmed (STATE OF DOMICILE); details included in the attachment.	Yes
Other Database Searches (RDC/MIS/Factiva)	No records found.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GS&I research for J Epstein and Co and Jeffrey Edward Epstein and the following derogatory information was reported:  Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.	Yes
State Court Searches	No records found.	No
Federal Court Searches	No records found.	No
Personal Particulars	No additional research necessary.	No
Publications	Nothing derogatory found.	No
Regulatory Sanctions	No records found.	No
OFAC/Control List Search	A search of OFAC did not reveal any matches.	No
Negative or Inconsistent Information		Yes

#### GCS Red Dot

Has this been identified as Red Dot KYC?	No
Negative Information Found	No

#### Banker Attestation Details

As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as from fraud and money laundering. By approving this KYC, I am sponsoring this client as to their character and reputation and from a legal/regulatory standpoint.	Yes
---	-----

Please state your rationale for conducting business with this client	Southern Financial is an entity that is ultimately owned by Jeffrey Epstein. Southern Trust Company, which merged with Jeffrey's other entity, Financial Trust Company, owns Southern Financial. It's a USVI company. Jeffrey is a USVI resident but remains a US citizen.
Please respond to any issue(s) identified in the GS&I grid that either needs further review, or red dot which is not already covered in a Business Case within this KYC	Issues with Jeffrey are understood and listed in his personal KYC.
Comments	

Primary Information			
Client Type	Non Individual	Front Office Restricted?	Normal
Client Status	Client	Active Indicator	Yes
Confidential Names?	No		
Legal Business Name	SOUTHERN FINANCIAL LLC	Insider Code (Reg. O)	
Country of Primary Domicile	VIRGIN ISLANDS, U.S.		
Primary Country of Assets	UNITED STATES	WebSite	
Country of Organization	VIRGIN ISLANDS, U.S.	Organization State	
Industry Code (NAIC)	Misc Financial Investment Activities [523999]	Secondary Industry Code (NAIC)	NAIC NOT PROVIDED [ ]
Client Legal Entity Type	Limited Liability Company	Client Category	Profit
Date of Incorporation/Situs (Date of Trust)	02/26/2013		
Documentary Evidence	LLC - State Certificate		
What is the nature/purpose of this entity?	This is a personal investment company for Jeff Epstein. He will be making investments into other vehicles through this entity.	Is the entity a Personal Holding Company (PHC) or Personal Investment Company (PIC) located in an offshore jurisdiction?	No
High Risk Jurisdiction	Yes		

Address(es)								
Type	Notes	Address	City, State, Postal Code	Country	Tools	Entered by	Date of Update	Preferred
Legal		6100 Red Hook Quarter, B3	St. Thomas , 00802	VIRGIN ISLANDS, U.S.	Map it	SYSTEM	03/13/2013	Yes

Phone(s)/Fax(s)						
Type	Notes	Phone Number	Tools	Entered by	Date of Update	Preferred
Work		3407752525	Verify "Do Not Call" List	SYSTEM	03/13/2013	Yes

Email(e)					
Type	Notes	Email	Entered by	Date of Update	Preferred
Work		[REDACTED]	CHRISTINE HEWITT	03/13/2013	Yes

Cost Center & Hierarchy					
Client Status	Client	Client Type	Non Individual		
Client Sponsor	JUSTIN D NELSON	New or Existing Client	Existing		
Cost Center	002753 - GREENWICH				
Client Service Team	CHBG (DE) 4	Entity Type	Entity		
GIO	Paul S Barrett	Portfolio Manger			
Trust Advisor		Investor			
Decision Maker	JEFFREY E EPSTEIN	DM ECI	[REDACTED]		

Identification			
Withholding Federal Status	Domestic Exempt		

Introduction & Wealth			
Introduction Type	Existing JPMorgan Client - Inside LOB		

Net Worth of client(\$)	5,000,000.00
-------------------------	--------------

Additional Entities	
<i>No additional entities available at this time</i>	

Additional Party Information								
ECI	Party Type	Party Name	Last Completed Search Date	KYC Status	Report Type	Relation Type	Powers	Percent Owned
	Individual	Jeffrey E Epstein	05/29/2012	Completed	Full	Sole Owner		100.0

Primary Information for Jeffrey E Epstein										
Client Type	Individual		Generation							
Client Status	Client		Active Indicator		Yes					
Front Office Restricted?	Normal		Marital Status		Single					
Confidential Names?	No									
Country of Primary Domicile	UNITED STATES		Primary Domicile State		New York					
Prefix/Title			Insider Code (Reg. O)							
First Name	Jeffrey		Full Name		Jeffrey E Epstein					
Middle Name			Gender		Male					
Last Name	Epstein		Date of Birth							
Suffix			Primary Country of Assets		UNITED STATES					
PreviousName/MMN/Alias										
Citizenship	UNITED STATES									
Employer Name	Self		High Risk Jurisdiction							
Occupation	Entrepreneur		Industry Code (NAIC)		Individuals [999940]					
Years at Occupation	0		Secondary Industry Code (NAIC)		Personal Investment Companies [525997]					

Address(es)								
Type	Notes	Address	City, State, Postal Code	Country	Tools	Entered by	Date of Update	Preferred
Legal		6100 RED HOOK QTRS STE B3,,	ST. THOMAS, , 00802	VIRGIN ISLANDS, U.S.	Map it	BATCH	08/03/2012	Yes

Phone(s)/Fax(s)						
Type	Notes	Phone Number	Tools	Entered by	Date of Update	Preferred
Home			Verify "Do Not Call" List	BATCH	02/22/2013	Yes

Email(s)					
Type	Notes	Email	Entered by	Date of Update	Preferred
<i>Email address not available</i>					

Cost Center & Hierarchy			
Client Status	Client	Client Type	Individual
Client Sponsor	JUSTIN D NELSON		
Cost Center	002753 - GREENWICH		
Client Service Team	CHBG (DE) 4	Entity Type	Decision Maker

Identification			
Withholding Federal Status	Domestic Certified	Withholding SSN/TIN Certification Date	09/18/2006
		SSN/TIN/EIN	
Form of government issued identification obtained for the files	Drivers License		
Primary Identification Number	[REDACTED]	Issued By	VIRGIN ISLANDS, U.S.

Date Issued	01/15/2010	Expiration Date	01/20/2015
<b>Introduction &amp; Wealth</b>			
Introduction Type	Existing JPMorgan Client - Inside LOB		
Net Worth of client(\$)	500,000,000.00		

<b>Source Of Wealth / Financial Information Details</b>	
Source Of Wealth -Identify the Clients Source of Wealth from following list of options	Other

<b>Introduction</b>	
Non Individual Entity Type	Limited Liability Company - For Profit
For Profit?	Yes
Locations Served?	International
a. If International or both, please describe:	Jeff will be investing in domestic and international funds.
Are beneficial owners/principal shareholders associated with this business?	Yes
Who owns this entity?	Individual
Please Provide ownership details	Jeff Epstein is the sole owner of this company.
Ownership is not equal to 100%?	No
Are there any authorized signers or any other individuals with authority over the entity?	No
What Independent background check, In addition to the Global Corporate Security ("GCS") background check, has been carried out? Check all that apply and provide the date in which the background check was conducted. (at least 1 must be selected)	JPMC Network
JPMC Network Date	03/13/2013
JPMC Network Comments	Jeff Epstein is a current client of Justin Nelson's and the PB.

<b>Politically Exposed Person</b>	
Are any of the beneficial owners/authorized signers or other individuals with authority over this entity a current or former Senior United States or Non-USA Political Official / also known as a Politically Exposed Person (PEP) or related to one?	No

<b>Source of Wealth/Financial Information</b>	
Client Category(for SOW)	For Profit
Source of Wealth- Identify the clients source of wealth from the following list of options	Executive Management
What is the client's current executive management position? (Include any former positions, if significant to source of wealth)	Epstein began his financial career in 1976 as an options trader at Bear Stearns. He specialized in mathematical models such as the Black-Scholes option-pricing model and later worked in the special products division, advising high net worth clients on tax strategies. In 1980, Epstein became a partner at Bear Stearns. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1987, Leslie Wexner, founder and chairman of the Columbus, Ohio-based Limited chain of women's-clothing stores became a well-known client. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it in the US Virgin Islands.  In 2003, Epstein publicly bid for New York Magazine, along with advertising executive, Donny Deutsch, investor Nelson Peltz, publishing mogul and owner of The Daily News, Mortimer Zuckerman and film producer Harvey Weinstein. They were ultimately out bid by longtime wall street investor Bruce Wasserstein for \$55 million. In 2004, Epstein and Mortimer Zuckerman, committed to finance up to \$25 million to back Radar, a celebrity and pop culture magazine and Maer Roshan, its editor in chief and founder. Epstein and Zuckerman were equal partners in the venture, and Mr. Roshan retained a small ownership stake
List the number of years in current position. (Include any former positions, if significant to source of wealth)	30
Approximate yearly income/salary/bonus/distribution and other compensation history (accumulated earned income)	10000000
Which country(ies) Is(are) the Client's primary Source of Wealth or Income derived?	UNITED STATES
Is this an Operating Company?	No
Total Net Worth \$	5000000.00
What was the total net worth based on?	Financial Statements

Is this client a Professional Service Provider acting as a financial intermediary (Gatekeeper/Financial Liaison), with assets held on behalf of one or more unidentified underlying clients unknown to the bank?	No
Is this entity a Private Equity Fund (Venture Capital Fund or Leveraged Buyout)?	No
Is this a Hedge Fund? (Pooled Investment vehicles (often partnerships) that primarily invest financial capital of third party investors in enterprises that are too risky for the standard capital markets or bank loans.)	No
Is this a Cash Intensive business? (Cash-Intensive businesses/entities exist in various industry sectors and include, but are not limited to convenience stores, grocery stores, restaurants, bars, retail stores, liquor stores, cigarette distributors, privately owned ATMs, vending machine operators and parking garage operators.)	No
Is this entity any of the following business types?	s. Private Holding/Investment Company (US)
Is the Entity a Personal Holding Company (PHC) or Personal Investment Company (PIC) located in an offshore jurisdiction?	No

Expected Activity		
Deposit Account(s)		
Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
Cash Deposits		
Cash Withdrawals		
Check Deposits		
Checks Paid		
Incoming Wires (Domestic)		
Outgoing Wires (Domestic)		
Incoming Wires (International)	Low (1-10)	\$50,001 TO \$100,000
Outgoing Wires (International)	Low (1-10)	\$50,001 TO \$100,000
ACH Deposits		
ACH Payments		
Internal Transfer (Debits/Credits)	Low (1-10)	\$100,001 TO \$500,000
Asset Purchases/Sales		
<b>What is the initial/ongoing source of funding for the client's Deposit Account(s) ?</b>		
The initial and ongoing source of funding will come from Jeffrey's personal accounts at the PB. The money in that accounts comes from his salary over the years and returns of his personal investments.		
<b>What is the purpose/intended use of account(s)? Please provide a detailed description of how the Deposit Account(s) will be used by the client.</b>		
The purpose of this is to make investments and to pay the expenses of the LLC.		
Client Directed Asset / Brokerage Account(s)		
Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
Cash Deposits		
Cash Withdrawals		
Check Deposits		
Checks Paid		
Incoming Wires (Domestic)		
Outgoing Wires (Domestic)		
Incoming Wires (International)		
Outgoing Wires (International)		
ACH Deposits		
ACH Payments		
Internal Transfer (Debits/Credits)	Low (1-10)	\$100,001 TO \$500,000
Asset Purchases/Sales	Low (1-10)	\$100,001 TO \$500,000
<b>What is the initial/ongoing source of funding for the client's Client Directed Asset / Brokerage Account(s) ?</b>		
The initial and ongoing source of funding will come from Jeffrey's personal accounts at the PB. The money in that accounts comes from his salary over the years and returns of his personal investments.		
<b>What is the purpose/intended use of account(s)? Please provide a detailed description of how the Client Directed Asset / Brokerage Account(s) will be used by the client.</b>		
The purpose of this account is to invest cash assets into the market.		

Additional Client Information	
Please include any additional information that would further explain your knowledge of the client (family tree/history, public information, websites, etc.)	

In March 2005, a woman contacted Palm Beach police, concerned that her 14 year old daughter had been taken to Epstein's mansion by an older girl and paid \$300 after stripping and massaging him. She had told him that she was 18 years old. She undressed but had left on her underwear. By 2011 at least 40 girls had come forward with similar stories, some saying Epstein sexually assaulted them during the massage.

Police started an 11-month undercover investigation of Epstein, followed by a search of his home. Subsequently, they alleged that Epstein had paid several escorts to perform sexual acts on him. Interviews with five alleged victims and 17 witnesses under oath, phone messages, a high school transcript and other items they found in Mr. Epstein's trash and home allegedly show that some girls were under 18, although some maintained to him at the time that they were of proper age. A search of Epstein's home found numerous photos of girls throughout the house, some of whom had been interviewed earlier by the police. He had set up a system of young women recruiting other women for his massage services. Two housekeepers stated to the police that Epstein would receive massages every day whenever he stayed in Palm Beach.[22] In May 2006, Palm Beach police filed a probable cause affidavit saying that Epstein should be charged with four counts of unlawful sex with minors and one molestation count. His team of lawyers included Gerald B. Lefcourt, Alan Dershowitz and later also Kenneth Starr. Epstein passed a lie detector test in which he was asked whether he knew of the under-age status of the girls. They also questioned the credibility of the teenage accusers, based in part on their MySpace postings and information obtained by private investigators.[not in citation given]

Instead of following the recommendation of the police, the prosecutors considered the evidence weak and presented it to a grand jury, an uncommon procedure in non-capital cases. The grand jury returned only a single charge of felony solicitation of prostitution, to which Epstein pleaded not guilty in August 2006.

In June, 2008, after pleading to a single state charge of soliciting prostitution, Epstein began serving an 18-month sentence. He served 13 months in jail of his 18-month sentence as a convicted sex offender in the state of Florida for soliciting an underage girl for prostitution. He is a registered sex offender.

After the accusations became public, several parties returned donations they had received from Epstein, including Eliot L. Spitzer, Mark A. Green, Bill Richardson, and the Palm Beach Police Department. Harvard announced that it would not return any money.

On June 18, 2010, Epstein's former butler, Alfredo Rodriguez, was sentenced to 18 months in jail for trying to sell a journal that he said recorded Epstein's activities. Special Agent Christina Pryor reviewed the material and agreed it was information "that would have been extremely useful in investigating and prosecuting the case, including names and contact information of material witnesses and additional victims.

#### Comment History

Stage Name	Creation Date	Entered By	Comment Preview
<i>There are no comments entered at this time.</i>			

#### Approval History

Stage Name	Signoff Date	Owner SID	Owner Name
Banker Attestation	06/07/2013 09:34 AM	U008568	JUSTIN D NELSON
Market Manager Approval	06/07/2013 10:59 AM	U117517	TOWNSEND C SMITH